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July 29, 2016

VIA ECF and E-mail

Honorable Kimba M. Wood
Senior United States District Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Williams, Steven Brown, Gerald Seppala.*
Docket No. S3 16 Cr. 436 (KMW)

Letter Application To Extend Travel Restriction Bail Conditions For Travel

Dear Judge Wood:

I write as the attorney for defendant Steven J. Brown seeking modification of his travel restrictions so as to include the Central District of California, the Southern District of New York, the Eastern District of New York, the District of Nevada, the Northern District of Illinois, the Eastern District of Louisiana, the Southern District of Florida and travel points between.

With respect to this modification, I believe that I can represent that I have the consent of both the Pretrial Services Officer and Assistant United States Attorney Patrick Eagan. Of course, Mr. Brown would be expected to provide all pertinent travel information to Pretrial Services beforehand.

In addition, I seek the Court's permission for Mr. Brown in or about early September, 2016 to travel to Spain to complete production of a children's family film called "Dance Angels", to Brittany, France to be present during a medical operation for an elderly family member and to Prague, Czechoslovakia in order to do work on two films, "Ghoul" and "Kajinek", in production there, or in need of his presence and skills to complete. This trip should last approximately ten days.

Honorable Kimba M. Wood

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With respect to this latter international travel, Pretrial Services customarily takes no position and AUSA Eagan opposes such for reasons previously argued that Mr. Brown is a flight risk.

All of the aforesaid international travel is represented by the defendant as essential to maintaining his employment other than a short visit regarding medical services for a family member. Mr. Brown will comply, of course, with the travel information requests of his Pretrial Services Officer.

Please feel free to raise any questions or concerns.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Walter Mack', enclosed within a large, loopy oval shape.

Walter Mack

cc: AUSA Patrick Egan (by ECF and email)
PTSO Natasha Ramesar (by email)
PTSO Matthew Carter (by email)